

1 MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com

2 ARTURO J. GONZALEZ (CA SBN 121490)
AGonzalez@mofo.com

3 ERIC A. TATE (CA SBN 178719)
ETate@mofo.com

4 MORRISON & FOERSTER LLP
425 Market Street
5 San Francisco, California 94105-2482
Telephone: 415.268.7000
6 Facsimile: 415.268.7522

7 Attorneys for Defendants
UBER TECHNOLOGIES, INC.,
8 OTTOMOTTO LLC, and OTTO TRUCKING LLC

9 KAREN L. DUNN (*Pro Hac Vice* app. pending)
kdunn@bsflp.com

10 HAMISH P.M. HUME (*Pro Hac Vice* app. pending)
hhume@bsflp.com

11 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
12 Washington DC 20005
Telephone: 202.237.2727
13 Facsimile: 202.237.6131

14 Attorneys for Defendants
UBER TECHNOLOGIES, INC.,
15 and OTTOMOTTO LLC

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 Plaintiff,

21 v.

22 UBER TECHNOLOGIES, INC.,
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,

24 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC.,
OTTOMOTTO LLC, AND OTTO
TRUCKING LLC'S
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL**

Trial Date: October 2, 2017

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,
2 Defendants Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC (“Defendants”)
3 submit this motion for an order to file under seal the confidential, unredacted versions of the
4 following documents:

- 5 1. Portions of Defendants’ Motion to Compel Arbitration of, and to Stay, Trade
6 Secret and UCL Claims (“Motion”);
- 7 2. Portions of the Declaration of Arturo González (“González Declaration”); and
- 8 3. Entirety of Exhibits 1-2 to the González Declaration.

9 The redacted portions of Defendants’ Motion, the González Declaration, and Exhibits 1-2
10 of the González Declaration discuss confidential information relating to employment agreements
11 and certain confidential proceedings between Plaintiff Waymo LLC (“Waymo”) and two former
12 employees. (Declaration of Arturo J. González In Support of Administrative Motion to File
13 Under Seal at ¶ 3.)

14 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the
15 documents at issue, with accompanying chamber copies.

16 Defendants met and conferred with Waymo regarding this Administrative Motion to File
17 Documents Under Seal on March 27, 2017. Defendants agreed that they will file the
18 aforementioned documents under seal, without a stipulation, and Waymo will file a declaration to
19 support sealing all or portions of the documents.

20 For the foregoing reasons, Defendants request that the Court enter the accompanying
21 Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and
22 designate the service copies of these documents as “HIGHLY CONFIDENTIAL –
23 ATTORNEYS’ EYES ONLY.”

1 Dated: March 27, 2017

MORRISON & FOERSTER LLP

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3 By: /s/ Arturo J. González
ARTURO J. GONZÁLEZ

4 Attorneys for Defendants
5 UBER TECHNOLOGIES, INC.,
6 OTTOMOTTO LLC, and OTTO TRUCKING LLC
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